

201-15441



Infrastructure, buildings, environment, communications

Mr. Michael Leavitt
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

Attn: Chemical Right-to-Know Program

Subject:

Submission of Quadrol (CAS No. 102-60-3) Documents via Electronic Submission
to oppt.ncic@epa.gov

Dear Administrator Leavitt:

On behalf of BASF Corporation, we are submitting the attached revised test plan and robust summaries for Quadrol (CAS No. 102-60-3). This submission, made under the U.S. EPA's High Production Volume Chemical Challenge Program, consists of a test plan for Quadrol and robust summaries for both Quadrol and a surrogate compound, triisopropanolamine.

We have addressed the comments received on our draft submission as follows:

Test plan: Data on measured values for the melting point and boiling point of Quadrol were not available. Thus, we propose to conduct studies to generate these endpoints. We also propose to conduct a study to determine the ready biodegradability of Quadrol. BASF plans to arrange for conduct of these studies within the next six months. No other testing is proposed, as adequate data have been provided for all remaining endpoints.

Robust summaries: Requested details were added to the robust summaries concerning the ECOSAR predictions for Quadrol for daphnids and algae, the fish study for Quadrol, and the fish, daphnia, and algal studies for triisopropanolamine. A few of these details were missing from the original study records. This included information about the test substance purity and test temperature for the study on *Pimephales promelas* with Quadrol, and information about the light intensity and quality, and statistical methods used to calculate EC values, for the study in green algae with triisopropanolamine. This missing information does not alter the judgment about the reliability of these studies. All other relevant details were added as requested by EPA.

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RISK & ASSOCIATED SERVICES

Date:

July 2, 2004

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Mr. Leavitt
July 2, 2004

The documents are being submitted in electronic format (Adobe Acrobat pdf files). If you have difficulty with the electronic submission or require additional information, please contact me, as BASF's representative, by phone (919-544-4535) or e-mail (jstaveley@arcadis-us.com).

Sincerely,

ARCADIS G&M, Inc.

Jane P. Staveley
Principal Environmental Scientist

Attachments:

Test Plan
Robust Summaries – Quadrol
Robust Summaries - Triisopropanolamine

Copies:

Mr. Edward J. Kerfoot, BASF Corp.